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| Change Number M-45-15-03 | Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink. | Date June 25, 2015 |
| Originator T. W. Fletcher, DOE-ORP | | Phone (509) 376-3434 |
| Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Executive Manager <input type="checkbox"/> III - Project Manager | | |
| Change Title Modify Milestone M-045-82 | | |
| Description/Justification of Change This change control form modifies Milestone M-045-82 for submittal of complete permit modification requests for Tiers 1, 2 and 3. The current milestone requires submittal of complete permit modification requests for all three Tiers by September 30, 2015. It is proposed that the milestone be modified to require submittal of "closure plans" for incorporation into the Hanford Sitewide permit. The addition of the words "closure plans" to the milestone clarifies the requirement of the milestone, as discussed with the Washington State Department of Ecology (Ecology), and brings the milestone into conformity with the requirements of the Hanford Federal Facility Agreement and Consent Order at Appendix I, Section 2.2.1. Since the original milestone was developed more detailed discussions have occurred between the agencies related to the details of the Tier 1, 2 and 3 documents. Waste Management Area C is the pilot and is the first of seven Waste Management Areas which will be closed. It is expected the process will evolve as experience is gained. A number of items were not addressed in Appendix I or the original milestone which the parties feel it is appropriate to clarify. The Tier 1 document discusses the overall SST system and will identify when other information will be submitted, either through the Tier 2 or 3 process, in order to have a complete closure plan. The Tier 1 and Tier 2 closure plans, and maybe Tier 3 will be submitted under Section 9.2.2 of the TPA <i>Part B Permit Applications and Closure/Post closure Plans</i> . When this process is completed it will result in a request to modify the permit. It is anticipated that after the review process in Section 9.2.2 the closure plan will be submitted under the existing 8C revision of the Hanford Sitewide Permit. It is understood that there may be changes when Revision 9 of the permit will be issued. It should be noted, that Appendix I, Section 2.2.1, allows for the Ecology and DOE to develop alternative schedules for permit processing to that appearing in Section 9.2.2, Table 9-2. Those changes will be made at the appropriate time when all the Revision 9 concerns are understood and agreed to. Good cause exists for changing the milestone due date for the Tier 2 and Tier 3 closure plans because information required from the performance assessment as well as characterization information from some WMA C components will not be available by the current milestone date. Good cause also exists for submittal of each of the Tier 3 closure plan(s) one year prior to initiating closure of its corresponding components. Submittal on this modified schedule will allow more complete information to be available to support preparation and review of the Tier 3 closure plan(s). Also, submittal of the closure plan(s) on this modified schedule would allow for a more efficient review and approval process. | | |
| Impact of Change This change control form modifies Milestone M-045-82 for submittal of complete permit modification requests for Tiers 1, 2 and 3. | | |
| Affected Documents The HFFACO, as amended, and Hanford Site internal planning, management, and budget documents (e.g., River Protection Project System Plan, baseline control documents, and related work authorizations and directives). | | |

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| Approvals | | |
|-----------|--|--|
| DOE | <u>6/29/15</u> <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved | |
| EPA | <u>7/13/15</u> <input type="checkbox"/> Approved <input checked="" type="checkbox"/> Disapproved | |
| Ecology | <input type="checkbox"/> Approved <input type="checkbox"/> Disapproved | |

Specific changes to Tri-Party Agreement Appendix D are displayed with double underline to indicate addition of text and by strikeout to indicate deletion of text.

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| <p>M-045-82 Lead Agency: Ecology</p> | <p>Submit complete <u>closure plans for incorporation into the Hanford Sitewide permit modification requests for Tiers 1, 2, and 3 (see Appendix I) of the SST System, to support final closure requirements for WMA C, according to the following schedule:</u></p> <ul style="list-style-type: none"> • <u>Tier 1: 9/30/15</u> • <u>Tier 2: With submittal of the Corrective Measures Study (CMS) under milestone M-045-61A due 12/30/16</u> • <u>Tier 3(s): One year prior to initiation of closure activities on corresponding components</u> <p><u>As described in Appendix I, the Tier 1 closure plan, commonly referred to as the "Framework Plan", documents requirements pertaining to the SST system overall. The Tier 2 closure plan is the mid-level plan specific to WMA C, and the lowest level closure plan (Tier 3) documents requirements pertaining to closure of individual SSTs and ancillary equipment.</u></p> | <p><u>9/30/2015</u> <u>As Indicated In The Descriptive Text Of This Milestone</u></p> |
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